



April 20, 2023

The Honorable Steve Marshall  
Attorney General's Office  
State of Alabama  
501 Washington Avenue  
Montgomery, AL 36104

Dear Attorney General Marshall,

My name is Stephanie Rodriguez. I am the Chief Executive Officer of the United States Organization of Licensed Massage Therapists (USOLMT). Our association is an advocate and supporter of the massage therapy profession nationwide.

Our Director of Government Relations, Kristie Williams is a Licensed Massage Therapist in Alabama and has been working closely with the Alabama Senate on HB 192. Our members have been watching the progress of this bill closely. I found out today that J. Matt Bledsoe from your office and Keith Warren with Warren & Company communicated to the House and Senate that the sub and amendments created to the massage law would prevent the Alabama State Board of Massage Therapy from providing protection against human trafficking under the guise of massage therapy.

With all due respect, unfortunately, the number of sexually oriented businesses operating under the guise of massage therapy has only grown since 2019. I have not seen any valid evidence that the Alabama Massage Board's efforts have stopped or provided public protection against sex trafficking. Based on the research done by one of our industry partners on sexually oriented businesses listed on Rubmaps.ch, statistical data shows that in 2019 there were 47 sexually oriented business in Alabama listed on the site and that number has grown to 219 in 2023. That's an increase of 172 sexually oriented businesses in Alabama in the last few years.

Additionally, the Polaris Project reported National Trafficking Hotline statistics from Alabama for the years 2007-2021, finding that in a span of 14 years there were 470 sex trafficking reports made to the Hotline, yet only 10 of those were related to massage businesses. Plus, since the State Board of Massage Therapy has no jurisdiction over businesses that operate in the commercial sex industry, I find Mr. Warren's current efforts problematic.

Alabama is not alone in increasing fees for legitimate massage therapists to fight Human Trafficking and Prostitution under the guise of massage therapy, but I find it highly unethical to force legitimate, licensed practitioners and business owners to supply the funding for these operations. Increasing the fees

associated with the practice of massage therapy has not in any way proven to decrease the number of sexually oriented businesses in your state, or any other state where it has been tried and/or implemented. Even though the topic of trafficking has gained national attention and become quite the focus for State Massage Therapy Boards, the occurrence of human trafficking happening under the guise of massage therapy only represents about 6% of all massage therapy businesses across the nation according to numbers provided by the Polaris Project.

While I strongly agree that human trafficking is an expanding problem in the United States and support the task forces, agencies, and government officials that work diligently to fight this heinous crime and provide support to the victims, I also believe that safe, effective, quality human touch is needed in our society and the people who provide it should be far more supported than they are today.

These fee increases have come along with tighter regulation of legitimate practitioners and establishments at a time when massage therapy students, new graduates, and massage therapy employees continue to be scarce across the country. This is a triple blow to the profession in an uncertain time when more massage therapists are desperately needed to meet growing consumer demand.

There are compelling reasons why the fees to practice massage therapy should be decreased instead of increased. By reducing the financial barriers to entry and the burden on established therapists the massage industry can continue to grow and thrive, benefitting both therapists and the clients they serve without diminishing the quality of massage therapy services and the safety of the public.

High costs create barriers to entry, causing burden on employers in Alabama and elsewhere, the economic climate may not allow some massage therapists or massage businesses to continue to operate in your state under a looming recession, high inflation, and higher fees simply to do their jobs while funding sex trafficking investigations.

I believe that license fees received by State Boards should be funneled to two main objectives:

- 1 – Protecting the Public
- 2 – Serving the Licensees

There should be clear and compelling evidence that the board's efforts and funds are truly protecting the public, however, in the case of sex trafficking, the number of sexually oriented businesses in Alabama increasing so rapidly in just a few short years shows that these efforts are not working. I am unsure of the answer to how to stop human trafficking, but I am positive that raising fees on legitimate massage therapy practitioners in Alabama isn't the solution.

Legitimate massage practitioners all over the country are already dealing with an uptick in sexual solicitation that comes in the form of text messages, obscene phone calls, sexual innuendo, and sexual assault in the treatment room from sex buyers who are not looking for legitimate massage therapy and has only served to make our profession more dangerous. I implore you to consider these facts and to cease the actions of Mr. Bledsoe and Mr. Warren immediately.

Sincerely,  
Stephanie Rodriguez  
Chief Executive Officer